OhioEPA

State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, Ohio 43216-1049

December 28, 2006

Re: Ohio Hazardous Waste Permit Renewal
Hukill Chemical Corporation
U.S. EPA ID No.: OHD 001 926 740
Ohio ID No.: 02-18-0315

CERTIFIED MAIL

Mr. Tim Jones
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Dear Mr. Jones:

Here is the renewed Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) for Hukill Chemical Corporation. The Permit is effective today, December 28, 2006. Since there were no comments received during the public comment period, there is no responsiveness summary for this permit action. The date-stamped, page-numbered copy of the Part B permit application is also enclosed.

Please remember that according to Rule 3745-50-36 of the Ohio Administrative Code your annual hazardous waste permit fee of $1,000.00 will be due on December 28, 2007. Ohio EPA will try to notify you before this fee is due, but it is your responsibility to make sure it gets paid on time.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions concerning compliance, do not hesitate to call Marlene Kinney of Ohio EPA's Northeast District Office at (330) 963-1162.

Sincerely,

for Pamela S. Allen, Manager
Regulatory and Information Services
Division of Hazardous Waste Management

Attachments

cc: Edwin Lim, Mgr., ERAS, DHWM
Jeremy Carroll, ERAS, DHWM
Dale Meyer, US EPA, Region V
Kurt Princic/Marlene Kinney, DHWM, NEDO
Carol Hester, PIC, Ohio EPA
file

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Columbus, Ohio 43216-1049

Certified Mail
Return Receipt Requested

Re: ***Hukill Chemical Corporation***
EPA ID # OHD 001 926 740
Draft Permit Renewal & Modifications

September 29, 2006

Tim Jones
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Dear Mr Jones:

The Ohio EPA, Division of Hazardous Waste Management (DHWM) staff have reviewed your April 30, 2003, Ohio hazardous waste facility installation and operation permit (Permit) renewal application. It is the recommendation of the staff that the director issue a draft renewal Permit and modifications for Hukill Chemical Corporation since the proposed changes to the permit appear to comply with applicable hazardous waste rules. Therefore, I have enclosed a draft renewal Permit and modifications in accordance with Rule 3745-50-40 and 3745-50-51 of the Ohio Administrative Code.

A public notice concerning the issuance of the draft renewal Permit will appear on October 2, 2006, in the Plain Dealer newspaper. A public announcement in similar form will be made over a local radio station. Ohio EPA will accept written comments relevant to the Permit application, the draft renewal Permit, and modifications until November 16, 2006. Written comments and/or a request to hold a public meeting should be submitted before the close of the public comment period by mailing comments to Ohio EPA, Division of Hazardous Waste Management, Attn: Regulatory and Information Services, P.O. Box 1049, Columbus, Ohio, 43216-1049, (614) 644-2977.

Details about this draft action may be viewed on Ohio EPA's Web site at http://web.epa.state.oh.us/dhwm/. Be sure to click on Stakeholder's Involvement.

After carefully considering public comments, Ohio EPA will reconsider the draft renewal Permit and modifications and should issue or deny the final renewal Permit by January 15, 2007.

If you have any questions concerning the draft renewal Permit, please call Marlene Kinney of Ohio EPA's Northeast District Office at (330) 963-1162.

Sincerely,

Pamela S. Allen

Pamela S. Allen, Manager
Regulatory and Information Services
Division of Hazardous Waste Management

g:\users\terryHukillChemicaldraftcover9'06.wpd

cc: Edwin Lim, ERAS, DHWM, CO
Jeremy Carroll/Jennifer Avellana, ERAS, DHWM, CO
Harriet Croke, US EPA, Region 5
Kurt Princic/Marlene Kinney, DHWM, NEDO
Carol Hester, PIC, Ohio EPA
file

HUKILL CHEMICAL CORPORATION

7013 KRICK ROAD • BEDFORD, OHIO 44146-4493
440 / 232-9400 • FAX 440 / 232-9477 • www.hukill.com
Over Fifty-Five Years of Quality Products and Services

June 29, 2006

Joseph P. Koncelik
Director of Ohio EPA
c/o Data Management Section, DSHWM
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Class 1 Modification Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Joseph P. Koncelik:

Hukill Chemical Corporation (HCC), requests a Class 1 Modification to their Part B Permit. The modification is required for those items updated to reflect the current conditions at permitted storage and treatment facilities.

The requested modifications are classified as a Class 1 Modifications because they fit the descriptions "B.1, and B.2" of the OAC Rule 3745-50-51 Appendix A. "Administrative and informational changes." and "Correction of typographical errors."

The following items were discussed during a review of the site permit application with the Ohio EPA District Office Facility Contact, Marlene Kinney on June 29, 2006.

Plan Sheet 6 and Plan Sheet 7 should be removed from the application they are no longer applicable.

The enclosed pages had typographical errors which were discussed and corrected today and are attached to be incorporated in to the current application.

All changed pages are attached in the redline/strike out version and clean copy.

If you have any questions or comments regarding this request, please call me at (440) 232-9400 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M Gammon
Manager, Environmental, Health and Safety

Cc: Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
Waste Management Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Marlene Kinney
Environmental Specialist
Ohio EPA, NEDO
2110 East Aurora Road
Twinsburg, Ohio 44087
(2 copies)

Robert Hukill w/o att
Vince Valentino w/o att

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June 2, 2005

Pamela Allen, Manager
Ohio EPA, DHWM
Regulatory and Information Services Section
Lazarus Government Center
122 S. Front Street
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC), is responding to Ohio EPA NOD sent May 27, 2004 Section E, from the site Hazardous Waste Permit Renewal Application. The changes are administrative and informational changes to provide clarification for the sites current conditions.

A redline copy and clean copy are provided for your review. Due to the number of changes and clarification a clean copy is provide with the current date to be used as the facility permit application.

Ohio EPA's comment is stated followed by HCC response along with the referenced page(s) with the appropriate changes.

Section E – Groundwater Monitoring Program

1) The Program Summary section indicates that ground water monitoring will be conducted in accordance with OAC 3745-54-90 through 99, 3745-55-01, 3745-55-001, and 3745-55-02. All references to OAC rule 3745-55-02 shall be deleted from the document as the rule has been recalled.

   HCC Response: Reference to the rule has been deleted also changes have been made to address other regulatory changes. OAC 3745-55-01 has been replaced by 3745-54-100.

2) Per OAC Rule 3745-55-01(D), the facility shall ensure compliance with the ground water protection standard (GWPS) outlined in OAC Rule 3745-54-92.

HCC Response: Rule 3745-55-01 has been replaced by OAC Rule 3745-54-100 in December 2004. HCC will comply with the GWPS outlined in OAC Rule 3745-54-92. The facility current operations should have no impact on ground water. The units are operated in accordance with RCRA regulations. The storage areas are inspected daily when in operation and secondary containment is present in all areas with the exception being the NO-Free Liquids area. The facility has detected contaminants in the ground water in relation to a unit which has been closed and is under RCRA Corrective Action. The unit is currently monitored semi-annually and the approved remedy is Monitored Natural Attenuation.

3) Per OAC Rule 3745-55-01(A)(1), the permit shall include a list of the hazardous constituents identified under OAC Rule 3745-54-93.

HCC Response: OAC Rule 3745-55-01 has been replaced by OAC Rule 3745-54-100 in December 2004. HCC will comply with OAC Rule 3745-54-93. Table E-1 has been added which list the waste codes which HCC is permitted to accept. The waste codes identify the constituents which HCC is permitted to accept. Reference to the table is provided on red-line copy page13.

4) The facility has failed to adequately discuss and establish concentration limits for the site-specific hazardous constituents. The facility plan shall specify a concentration limit (background, maximum concentration limit (MCL) or alternate concentration limit (ACL) for each hazardous constituent in the ground water as defined in OAC Rule 3745-54-94. Whichever standard is utilized, the concentration limit will be applied at the point of compliance (POC). The permit application appears to indicate that the facility is using non-detect as background as a concentration limit, but this decision should be clearly stated.

HCC Response: The facility is currently under RCRA Corrective Action the POC wells have contaminants above background and MCL levels in many cases. HCC intends to conduct intra well statistics to determine the ACL for the point of compliance. The ACL will be the 95% Upper Prediction Limit calculated using the previous eight sampling results from each POC well. The current groundwater sampling result will be compared to the ACL. Red-line copy page 17.

5) A ground water monitoring system must be capable of detecting any hazardous constituents in the ground water downgradient of the POC to the property boundary that exceed their concentration limits. The POC does not equal a set of wells, rater a set of wells are required to monitor the quality of ground water passing through the POC as defined in OAC Rule 3645-54-95. The wells at the POC, at which the ground water protection standard applies, shall be specified in the plan. A map with a line delineating the limits of the waste management area(s) shall be included in the permit. If the facility contains more than one regulated unit, the waste management area shall be delineated by a line circumscribing the several regulated units at the limit of waste placement. If the

facility chooses to apply for an ACL as the concentration limit, the point of exposure (POE) will also need to be delineated. The POE my be no further than the end of the plume and may not go beyond the property boundary.

HCC Response: The following has been added to page 13 of the red-line copy which discuses the units. [The groundwater monitoring system at HCC includes the following wells located at the point of compliance (POC) well A, B, G and F. These wells are identified on the site map E -1. The map also delineates the limits of the waste management areas. The map identifies the RCRA Corrective Action Unit, Solid Waste Management Unit and the RCRA permitted storage and treatment units. The map also indicates the point of exposure wells (MW-E, SW-2, SW-3, and MW-H). New well will be installed which will be a point of exposure well it will be referenced as MW-J.

6) According to OAC Rule 3745-55-01(E), the GWPS also must be met at all points downgradient of the POC, both on property and off. DDAGW is concerned that the ground water monitoring system is insufficient downgradient of the known contamination at MW-B. The facility shall install a ground water monitoring well between MW-B and the property boundary to evaluate the rate, extent, and concentrations of contamination in this area(OAC Rules 3745-54-91 (A)(3) and 55-01(E)). Data from this well shall be subject to the statistical evaluations performed on MW-H, SW-2, and SW-3.

HCC Response: A monitoring well will be installed in 2005 at a location agreed with OEPA. The well will be between MW-B and the property boundary. The data from this well shall be subject to the statistical evaluations performed on MW-H, SW-2, and SW-3. Page 13 of the red-line copy. This well will be referenced as MW-J.

7) If a statistically significant parameter ("verified exceedence") is confirmed in SW-3, the facility shall install a ground water monitoring well downgradient of this location a the property boundary to evaluate whether contamination is leaving the site in this area. (OAC Rule 3745-54-91(A)(3) and 55-01(E)).

HCC Response: HCC will install a well downgradient to SW-3 if a verified exceedence occurs. This statement has been added to red-line copy page17.

8) The Program Summary section and the CP/CMI indicate that "a confirmatory sampling event will be initiated immediately upon encountering the trigger concentrations." DDAGW interprets "immediately" to mean as soon as technically feasible after the statistically significant event is identified. It is recommended that the re-sampling event be completed within thirty (30) days, which is feasible in most instances. "Immediately" is evaluated site-specifically based on receipt of ground water quality results, completion of statistical calculations, and scheduling a re-sampling event. The next regularly scheduled event is not acceptable. In the future, if a statistically significant parameter ("verified exceedence") is identified, the facility shall resample the suspect well or wells as soon as technically feasible.

HCC Response: HCC has included in the Section E the statement that should a "verified exceedence" occur the facility will resample the suspect well or wells as soon as technically feasible. Red-line copy page 14.

9) In the section Triggers that Activate the Contingency Plan, trigger 1 (Detailed Statistical Evaluation) is not clear in describing what action will be taken if it is determined that "recent data' exceeds "early data". In addition, this section should address the action to be taken if observed concentrations, while perhaps no exceeding early data, are above the concentration limits set according to OAC Rule 3745-54-94 anywhere downgradient of the POC, at the property boundary, or off-site.

HCC Response: If, a sampling result exceeds the ACL at the POC (see response #4), the monitoring well in question will be re-sampled within one month to confirm the result. If confirmatory sampling yields data below the trigger, HCC will resume the monitoring program currently in place. If the confirmatory sampling yields data above the trigger, monitoring frequency will be increased to quarterly for a one-year period. Additionally, the OEPA will be notified within fourteen days of receipt of the confirmatory data. Red-line copy page 18.

10) In the section Triggers that Activate the Contingency Plan, trigger 2 (Increased Monitoring Frequency), allows for the collection of a total of 6 quarterly ground water samples, at these locations for example, followed by submittal of a report. Such a program is not in compliance with OAC Rule 3745-54-90 through 3745-55-01. The decision of whether to go to the next higher level of monitoring (i.e., a monitoring program defined under the contingency plan) should be based on the results of the confirmation/re-sampling event. DDAGW is further concerned that such a time table for action at the property boundary is not protective of human health or the environment. OAC Rule 3745-54-99(G&H) provide time tables and actions to be taken by the facility if it is determined that any new constituents has been detected or if a concentration limit is being exceeded at a POC well or at any well downgradient of the POC.

HCC Response: Noted. See response to comment 9.

11) The section titled Triggers that Activate the Contingency Plan, states that "HCC will perform an intra-well comparison through either a simple linear regression or group mean test analysis." The facility shall clarify what is meant by "group mean". It is acceptable to use a group mean in the calculation of background using multiple gradient wells. It is unacceptable to calculate a "group mean" based on values collected from a combination of more than one downgradient well. Only the statistical tests presented in OAC Rule 3745-54-97(G, H&I) will be used to determine contamination or/and exceedances of the concentration limits.

HCC Response: As described in response #4, HCC intends to use the 95% UPL calculation to define the ACL for POC wells. Red-line copy page 17.

12) Since it appears that monitoring wells have not been analyzed for Appendix IX parameters (listed in the appendix to Rule 3745-54-98) as required by Rule 3745-54-99(G), DDAGW recommends that wells C, B and I be analyzed for Appendix IX parameters, excluding the herbicide and pesticide suites.

HCC Response: During the June 2005 sampling event Appendix IX parameters will be run on samples collected from wells C,B and I.

Additional Comments

The April 2001 Revised RCRA Closure Plan and RCRA Corrective Measures Implementation Plan indicates that all ground water monitoring will be conducted in accordance with OAC Rule 3745-54-90 through (sic) 3745-55-02. However it should be noted that considerable information required by these rules is not provided in this document. The following information shall be inserted into the plan:

13) The correct citation of the "54" rule is 3745-54-90 through 3745-54-100 and 3745-55-011. All references to 3745-55-02 shall be deleted from the document.

HCC Response: References to rule 3745-55-02 have been deleted and the reference to 3745-54-99 has been changed to 3745-54-100. This change has been made due to regulatory changes.

14) The permit shall specify each of the four components of the GWPS listed in OAC Rule 3745-55-01(A), since hazardous constituents have been detected in the groundwater:

a) A list of site-specific hazardous constituents identified under rules3745-54-93;
b) Concentration limits for each constituent under rule 3745-54-94;
c) The compliance point under rule 3745-54-95; and
d) The compliance period under rule 3745-54-96.

HCC Response: The section E has been modified to include the four components of GWPS, including:

a) The site-specific hazardous groundwater constituents include methylene chloride; tetrachloroethene; trichloroethene; 1,1,1-trichloroethane; trans-1,2-dichloroethene; 1,1-dichloroethane; and vinyl chloride. Red-line copy page 6.
b) The concentration limits for each COC are calculated from the previous eight sampling events. Red-line copy page 14 &17.
c) The compliance points are monitoring wells A, B, G, and F. Site map.
d) Groundwater sampling associated with the April 2001 Closure Plan will continue for approximately 26 years. Red-line copy page 13.

15) Appendix D, Table 6, indicates that duplicate ground water samples will be collected at a rate of 1 per 20 samples. This is not acceptable to DDAGW. Duplicate ground water samples should be collected at a rate of one per ten samples.

HCC Response: Duplicate samples will be collected at a rate of one per ten. The change has been made to Appendix D, Table 6.

16) The facility shall include a general reference that all data associated with the ground water monitoring program will be submitted annually in a ground water monitoring report in compliance with OAC Rules 3745-54-75 and 3745-54-97(J). The annual ground water monitoring report shall include the appropriate data in the electronic format as outlined in the Supplementary Annual Report for supplied by the Director. The report forms are available on the web at http: www.epa.state.oh.us/dhwm/ann_report.html. This annual report shall be submitted to Ohio EPA by March 1 of each year.

HCC Response: The statement has been added to the Revised Closure Plan page 22 of the red-line copy. Section 4.2.4.3.

17) In addition to submission of the Supplementary Annual Report form, Rule 3745-55-501(G) requires the facility to semiannually submit reports on the effectiveness of the corrective action program. Wording to this effect shall be incorporated into the document.

HCC Response: Wording has been added to the Revised Closure Plan red-line copy page 22 section 4.2.4.3.

18) At the completion of all ground water monitoring activities and prior to the closure certification, monitoring wells should be properly plugged and abandoned. Compliance will be facilitated by referring to methodology described in Chapter 9 of Ohio EPA's Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring (Feb 1995). Wording to this effect shall be incorporated into the document.

HCC Response: Wording to address closure of the monitoring wells has been added to the Revised Closure Plan section 4.2.4 page 20 of the red-line copy.

19) In their ground water monitoring reports, the facility identified wells E, H, SW-2 and SW-3 as "point of compliance" (POC) wells. OAC rule 3745-54-95 defines POC wells as located at the hydraulically down gradient limit of the waste management area. By this definition none of the "POC" well identified by the facility are acceptable. Wells E and SW-2 would be acceptable as point of exposure wells if the facility is able to meet alternate concentration limit (ACL) guidelines. However well H would not be able to be acceptable as a point of exposure well because it appears to be located off-site, as shown on Figure 1 of the ground water monitoring reports.

HCC Response: The reference to POC wells in the next report will be corrected and in accordance with OAC rule 3745-54-95. Well H is outside of the facility fence but with in Hukill Chemical Corporation property boundaries therefor it can be used as a point of exposure well.

20) DDAGW is concerned that a large sewer crossing the eastern portion of the site in a north to northeast direction may act as perferential pathway for contaminant migration. The facility shall provide Ohio EPA with construction details, including depth and backfill material. The outfall for this sewer line shall be located and any seasonal seems adjacent to the outfall sampled and analyzed for site-specific constituents.

HCC Response: The outfall line was installed under an Army Corp Engineers. A copy of the permit will be added as an attachment to Section E of the permit. It will include information related to the type of fill material used. The extent of the backfill and analytical data available for the backfill. The source information for the backfill material. Reference on Page 2 of the red-line copy.

21.) The ground water monitoring program shall include sampling and analytical methods that are appropriate for ground water sampling and that accurately measure hazardous constituents in ground water as required by OAC Rule 3745-54-97(E). For example, vinyl chloride has an MCL of 2 ug/l. The facility's analytical laboratory is using a method detection limit of 10 ug/l. This is not acceptable to DDAGW. The analytical laboratory must be able to achieve reporting limits that provide the lowest limit of detection for the corresponding analytical method as specified in the US EPA SW-846 Methods. Every effort should be made to keep analytical detection limits equal to or below maximum contaminant levels (MCLs). If this is not possible due to interference, a statement to this effect should be included with the report.

HCC Response: HCC is working with the laboratory prior to the sampling events to ensure that detection limits are equal or blow MCLs. A statement has been to page 15 of the red-line copy of Section E.

22.) During a recent site visit, Ohio EPA discussed the possibility of a reduced monitoring schedule on certain perimeter wells. While DDAGW is willing to consider such a request, it cannot evaluate this matter further until issues related to the accuracy of the analytical results electronic data base and the resulting statistical analyses are resolved. As noted during a review of the Second Quarter 2003 data, there appears to be a problem with the plotting of data points on the Up vs Down Prediction Limit charts. Data points on the charts are commonly under reported as much as an order of magnitude relative to the values reported by the analytical laboratory. ...DDAGW cannot consider a reduced sampling frequency on certain well(S) until such time as the extent of contamination in ground water and the statistical significance of this impact can be accurately evaluated. The facility shall submit a copy their electronic data base to the Ohio EPA for review.

HCC Response: HCC will submit their electronic database of the data to the Ohio EPA following the next sampling event and include the June 2005 data. The June 2005 event is scheduled and will include the Appendix IX parameters.

Certification page is also included. Section J.

If you have any question or require additional information please feel free to call me at (440) 232-1924 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M. Gammon
EH&S, Manager

Attachments

CC: Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
Waste Management Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

R. Hukill w/o att
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June 2, 2005

Pamela Allen, Manager
Ohio EPA, DHWM
Regulatory and Information Services Section
Lazarus Government Center
122 S. Front Street
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC), is responding to Ohio EPA NOD sent March 3, 2004 Section I, from the site Hazardous Waste Permit Renewal Application. The changes are administrative and informational changes to provide clarification for the sites current conditions.

A redline copy and clean copy are provided for your review. Due to the number of changes and clarification a clean copy is provide with the current date to be used as the facility permit application.

Ohio EPA's comment is stated followed by HCC response along with the referenced page(s) with the appropriate changes.

Section I – Closure Plan

Description of Facility

1) The closure plan shall include a description of the facility including the type of industry, size, products, a description of the processes that generate hazardous waste, and the facility's hazardous waste management methods.

HCC Response: Facility description has been expanded to include more detail. This starts on Page 2.

Map of Facility

2) HCC shall include a detailed facility map showing the location of each hazardous waste management unit, a north arrow, scale, and legend in the closure plan.

HCC Response: Site drawing showing the locations of each hazardous waste management unit, north arrow, scale and legend has been added to the closure plan. The drawing is labeled Site Map.

3) HCC shall include a topographical and/or county map including a north arrow in the closure plan.

HCC Response: A topographical map is provided and a larger scale map is referenced which is located in the Part A and Section B of the Part B permit. The larger drawing can be provided to contractors when the closure plan is implemented.

Description of Units to be Closed

4) HCC fails to include geologic and hydrogeologic information in the closure plan. HCC shall include a summary of geologic and hydrogeologic information in the closure plan.

HCC Response: A summary of the site geologic and hydrogeologic information was added starting on page 9 of the red-line copy.

5) HCC fails to include information about secondary containment of the units to be closed in the closure plan. The closure plan shall include a description of the type of secondary containment provided, the age of the secondary containment, and whether the secondary containment is structurally sound, free of cracks/holes, visible staining and other potential evidence/mechanisms of release.

HCC Response: Information regarding secondary containment has been added for each of the units to be closed in the closure plan. More detailed information is in Section D of the site permit which will be provided as an addendum at closure implementation.

6) The closure plan shall include the following information about the container storage units to be closed:
   a) whether the base is designed to contain leaks, spills or precipitation;
   b) dimensions of the unit:
   c) period of use for hazardous waste storage:
   d) construction details (drawings/blueprints); and
   e) a description of any other structures associated with the hazardous waste management units.

HCC Response: Additional information is provided regarding the container storage units. Also the detailed engineering information provided in Section D will be provided as an addendum to the Closure Plan at implementation.

7) The closure plan shall include the following information about the tank systems to be closed:
   a) the type of tank system (aboveground, on-ground, in-ground, underground);
   b) dimensions of the tanks;
   c) period of use for hazardous waste management;
   d) construction details (drawings/blueprints); and
   e) a description of any other structures associated with the hazardous waste management unit.

HCC Response: Additional information is provided regarding the tank systems to be closed. Also the detailed engineering information provided in Section D will be provided as an addendum to the Closure Plan at implementation.

8) HCC shall document in the closure plan whether any releases have occurred from the hazardous waste management units to be closed. If there have been releases, HCC shall specify when the releases occurred and the remedial measures taken at the time of the releases. If no releases have occurred, HCC shall specify how this was determined (e.g. review of inspection records, sampling, etc.)

HCC Response: This information was added on Page 13 through 15 of the red-line copy.

Schedule for closure

9) Figure I-1 shows that closure activities will take place over 15 months. OAC Rule 3745-55-13 (B) states that the owner or operator shall complete partial and final closure activities in accordance with the approved closure plan and within one hundred and eighty days after receiving the final volume of hazardous waste at the hazardous waste management unit or facility. HCC shall change Figure I-1 to show that closure activities will take no longer than one hundred and eighty days after receiving the final volume of hazardous waste at each unit to be closed.

HCC has closed the Acid Tank and Dike (Certified closed by letters dated 12/3/99 and 12/6/00) Items 4 and % in the closure schedule shall be deleted as they no longer apply.

HCC Response: New closure schedule is provided to complete the activities within 180 days. The activities for the various units will occur in parallel. Also the closed items have been removed from the schedule.

Other Permits

10) HCC shall list all permits that will be required for successful implementation of the closure plan, including NPDES, air emission, or other permit requirements. Although this information may be included in other sections of the permit

application, because the closure plan has to be a complete and stand-alone document, this information shall be included in the closure plan as well.

HCC Response: The information has been added as I-1f(3) Other Permits Page 22 of the red-line copy. No additional permits are anticipated for the closure activities. The facility current permits are listed.

11) HCC shall describe the release control to be used during decontamination activities. Section 3.10 of the CPRG states that in order to prevent the contaminated rinseate from contaminating other environmental media, the area surrounding the equipment or secondary containment should be prepared to capture rinseate and other waste prior to initiation of decontamination activities. Such preparation may include, but is not limited to, the installation of a decontamination pad for contaminated equipment, the installation of absorbent booms along the edge of the contaminated secondary containment (with curbing to prevent run-off), or the installation of a drainage system around the containment with a rinseate collection basin.

HCC shall provide design details for the equipment decontamination area (e.g., decontamination pad). Information required should include a scale map showing the location of the decontamination area, materials of construction, liner specifications, the method of rinseate collection, and decommissioning procedures. The following guidelines, as given in the CPRG, detail recommended basic design criteria for decontamination pads:

a) The pad should be able to bear the load of the equipment to be decontaminated and should be sufficient in size to accommodate the largest piece of equipment plus an appropriate space to conduct decontamination activities.
b) The pad should be designed to capture all rinseate generated and prevent release of contaminants to the environment. This may include shielding to protect from wind dispersion, over-spray, and precipitation events.
c) The pad should not be damaged by use.
d) The design and construction of the pad should not pose or increase the threat to human health and the environment.
e) The pad and its construction material shall be properly managed at all times (i.e., treated as hazardous waste unless proven otherwise).

HCC Response: Absorbent booms and plastic will be placed around the secondary containment to capture any over spray. Also dikes will be constructed in areas where curbing does not currently exist like the no free liquids area. Again plastic will be place around the unit. (Page 14 of the red-line copy)

12) Page 5 of Section I of the permit application describes analysis of rinseate samples for confirmation of decontamination. HCC fails to describe the Quality Assurance/Quality Control (QA/QC) procedures associated with analysis of the rinseate samples. This information shall be provided in the closure plan.

HCC Response: HCC will use an off-site laboratory for analysis of the closure samples. The laboratory will use appropriate EPA Methods for analysis and will have a QA/QC program. When samples are collected a duplicate will be taken every 10 samples or at lease one duplicate during a sampling even if less than 10 samples are collected. Trip blank will all be used.

Closure Strategy/Remediation Standards

13) Page 5 and 8 of Section I of the permit application state that a professional engineer will evaluate the analytical results compared to clean closure standards. HCC shall revise this statement to state that analytical results will be compared to background conditions for naturally occurring compounds (using either the CPRG generic remediation standards or site specific background standards) and to method detection limits for non-naturally occurring compounds.

Additionally, Pages 5 and 8 of the permit application state that core samples will be taken inside the Drum Processing Building, Container Storage Area, each hazardous waste tank dike and outside each tank dike. TCLP will be run on a composite of samples for each area mentioned above. HCC shall revise the statements to say that totals, not TCLP, will be run and samples will be discrete samples, not composited ones.

HCC Response: The requested changes have been made starting on page15 of the red-line copy.

Certification

14) HCC shall specify in the closure plan that the certification will include the wording found in OAC 3745-50-42 (D).

HCC Response: The plan includes the certification wording specified.(Page 22 of the red-line copy)

Additional Review Comments
I-1a Closure Performance Standard

15) Page 3. HCC shall rewrite the first sentence of the second paragraph of this subsection to read, "Closure procedures for a storage, Treatment, and processing facility will be followed."

HCC Response: The change has been made, page 11 of the red-line copy.

16) Page 3, same paragraph as above. After the sentence where HCC describes decontamination of processing equipment, HCC shall add a sentence which states that the strainer/manifold will also be disassembled and decontaminated at closure of the facility.

HCC Response: The statement has been added, page 11 of the red-line copy.

I-1f(2) Personnel Safety and Fire Prevention

17) Please delete the following sentence "Section H, "Personnel Training", of the Part B Application covers the training requirement for the closure of the this facility." Section H of the permit application does not address this topic.

HCC Response: The statement has been deleted and a more accurate description of the training requirements has been added, page 21 of the red-line copy.

Table 2

18) HCC shall include the strainer/manifold to this table.

HCC Response: Table 2 has been corrected.

Certification page is also included. Section J.

If you have any question or require additional information please feel free to call me at (440) 232-1924 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M. Gammon

Marian M. Gammon
EH&S, Manager

Attachments

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HH 8 May 05

HUKILL CHEMICAL CORPORATION

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Over Fifty-Five Years of Quality Products and Services

April 27, 2005

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Columbus, Ohio 43216-1049

Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC), is responding to Ohio EPA NOD sent March 16, 2004 Section D, from the site Hazardous Waste Permit Renewal Application. The changes are administrative and informational changes to provide clarification for the sites current conditions.

A redline copy and clean copy are provided for your review. Due to the number of changes and clarification a clean copy is provide with the current date to be used as the facility permit application.

Ohio EPA's comment is stated followed by HCC response along with the referenced page(s) with the appropriate changes.

Section D – Process Information-Container Storage

1) HCC shall describe the 24 hour staging area where drums are staged prior to sampling and analysis on the loading /unloading dock. This description can be added to the narrative found on Page 3.

HCC Response: A description has been added to the narrative on page 3 to include the 24-hour staging area.

2) Plan Sheet 7 is outdated and shall be replaced wit a drawing that reflects the current layout of the Drum Storage Room. A smaller drawing may be used.

HCC Response: Plan Sheet 7has been replaced with an updated drawing, which is in a smaller format.

Container Management Practices

3) HCC currently maintains aisle space at two feet in the container storage room. HCC shall change the typo on page four where it indicates that aisle space will be maintained at three feet.

HCC Response: The typo has been corrected.

4) HCC shall provide a diagram showing where incompatible wastes are stored in the container storage room. See attached drawing.

HCC Response: The drawing has been incorporated as Plan Sheet D-7 which shows where incompatibles are stored in the container storage area.

Secondary Containment System Design and Operation

5) On page 8 HCC shall correct the typo, 550 gallons to read 5500 gallons.

HCC Response: The typo has been corrected.

Section D – Process Information- Tank Storage and Treatment

6) HCC is a storage and treatment facility, therefore, on page 11, HCC shall rename the section " Tank Storing and Treating Hazardous Waste".

HCC Response: The section has been renamed.

7) HCC shall add a description of the strainer/manifold system, located in the build unloading area of the East Pad Area, and explain its use in daily operations

HCC Response: The strainer/manifold system discussion was added to the description section page 12 on the Tank Storage and Treatment section.

8) On pages 19,20, and 21 HCC discusses the management of hazardous waste in the 1000-gallon disperser tank and auger tank. HCC fails to describe the role of the strainer manifold in the treatment of chemfuel waste streams. HCC shall describe in the treatment process in more detail.

HCC Response: A discussion was added to include the strainer in the treatment of chemfuel waste streams. Added to page 22 of the redline copy.

9) On page 20, second paragraph from the bottom, HCC shall delete the following statement; "the auger system is exempt from the permitting requirements because it processes chemfuel". That statement is no longer true.

HCC Response: The statement has been removed.

10) Exhibit D2, page 4. HCC shall remove the reference to tank V-120. The tank no longer exists.

HCC Response: The reference to tank V-120 has been removed from the section.

11) Exhibits D-8 and D-12, assessments for the 1000-gallon disperser tank and auger tank. Each exhibit has a table of contents. In the Table of contents there is an item called "Tank System Description, Storage Tank". HCC shall change "Storage Tank" to "Storage and Treatment Tank" for Exhibits D-8 and D-12.

HCC Response: Changes have been made to the table of contents as stated above.

12) There is a section called Tables in Section D. The following changes are necessary.
   a) Table 1 is outdated and shall be removed. HCC shall provide an updated chart which lists each hazardous waste storage tank, the dike it is located in, the material of construction of the tank, tank volume, and minimum thickness for taking the tank out of service.
   b) Table 2 is outdated. " The Spent Acid Tank" column shall be deleted since the spent acid tank has been closed.
   c) Table D-3 is outdated. HCC shall delete (or cross out) all references to planned units.

HCC Response:
a) Table 1 was outdated and an updated chart is provided to replace Table 1. Table 1 now contains the require information.
b) Table 2 is outdated and the Spent Acid Tank reference is deleted.
c) Table D-3 is outdated and reference to planned units has been crossed out.

13) There is a section called Figures in Section D. HCC shall remove figure D-5. Figure D-5 is an illustration for the installation of a rail siding and hazardous waste storage tank dike that is no longer planned.

HCC Response: HCC is requesting that Figure D-5 is removed from the permit. The illustration for installation of a rail siding and hazardous waste storage tank dike is not planned at this time. A copy of the section to be removed is provided to ensure the correct figure is remove.

Certification page is also included. Section J.

If you have any question or require additional information please feel free to call me at (440) 232-1924 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M. Gammon
EH&S, Manager

Attachments

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Over Fifty-Five Years of Quality Products and Services

November 30, 2004

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Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC) is responding to Ohio EPA NOD sent April 5, 2004 regarding Section F and Section H of the site Hazardous Waste Permit Renewal Application. The changes are administrative and informational changes to provide clarification for the sites current conditions.

Section F- Procedures to Prevent Hazards

General Inspection Requirements.

1) To the inspection schedule, Exhibit F-2, HCC shall add inspection of the new concrete tank dike that was placed over the former hazardous waste tank farm. (This concrete dike is the alternate RCRA cap which was installed during the summer of 2002.) The inspection frequency shall be weekly.

Response by HCC: The form has been modified to include the area and a copy of the revised form is attached.

Unloading Operations

2) HCC describes loading/unloading operations on pages 11 and 12, but fails to describe loading/unloading operations on at the strainer/manifold, at the Fuels dike (Tanks T-14, T-15 and T-16), and at the process room tanks (8-3-F, 9-3-F, 10-3-F, 11-3-F). HCC shall include a discussion of loading/unloading procedures at the above listed hazardous waste management areas.

HCC Response: Descriptions were added to the appropriate sections as required in item 2.

3) HCC shall add the location of the strainer/manifold to Figure F-3A.

HCC Response: The location of the strainer/manifold has been added to Figure F-3A.

General Comments

4) HCC shall correct the typographical errors:
   A) Page 4, importance is misspelled.
   B) Page 7, calculations were done using the 25 year storm event, not a 10 year storm event as written. Also on page 10, visual is misspelled.
   C) Page 9, two feet of aisle space is maintained, not three feet.

HCC Response: The Changes noted in item 4 were corrected.

Section H- Personnel Training

Outline of Training Program

5) HCC outline of training program includes general training for all employees, and then lists initial and annual training for management and operations personnel. HCC shall include an outline of initial and annual training for laboratory personnel.

HCC Response: A section has been added to address Laboratory Personnel Initial and Annual training. Pages 4 and 5 of the red-line copy.

Emergency Response Training

6) Figure H-27 was last revised in 1991. It outlines emergency spill procedures, plant shutdown procedures, and the emergency shutdown procedures for the LUWAs 1 and 2. No shutdown procedure is given for the still pot. HCC shall include the shutdown procedure for the still pot and HCC shall update the procedures listed in this exhibit if any changes have been made since 1991.

HCC Response: This procedure has been revised and is attached this is a current revision.

Job Titles

7) HCC shall state that as required by 3745-54-16 (D)(1), job titles for each position at the facility that is involved with hazardous waste management are kept in the operating record and in each individual's personnel file. Additionally, HCC shall state that the name of every employee filling these positions is kept on record as part of the operating record, and is available for OEPA inspection.

HCC Response: The above statement was added to Section H page 7 of the red-line copy.

Training Descriptions

8) HCC shall add to Figure H-22 an outline of the introductory training given to laboratory personnel. HCC shall also state, on page7 in section H-4c, that a written description of the type and amount of introductory and continuing training that will be

given to each person filling a position related to hazardous waste management is kept on record at the facility.

HCC Response: A section has been added addressing laboratory personnel.

General Comments

9) On page 4, a reference is incorrectly made to Figure H-7. The figure number is Figure H-26. HCC shall make the change.

HCC Response: The correction to the figure reference has been made on page 4.

A certification page is included. Section J.

If you have any questions or comments regarding this request, please call me at (440) 232-9400 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M. Gammon
EH&S, Manager

Attachment

CC: Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
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U.S. EPA, Region 5
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November 10, 2004

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122 S. Front Street
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Columbus, Ohio 43216-1049

Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC), is responding to Ohio EPA NOD sent December 23, 2003 regarding Section B, from the site Hazardous Waste Permit Renewal Application. The changes are administrative and informational changes to provide clarification for the sites current conditions.

A red-line copy and clean copy are provided for your review. Due to the number of changes and clarification a clean copy is provide with the current date to be used as the facility permit application.

Ohio EPA's comment is stated followed by HCC response along with the referenced page(s) with the appropriate changes.

Section B – Facility Description

B-1 General Description:

10) On pages B2 and B3, HCC must provide an updated description of the permitted hazardous waste management units (items 1-6 on pages 2 and 3), the facility's hazardous waste management methods, and a description of the unpermitted areas of the facility where hazardous waste is staged prior to storage, treatment, or processing.

HCC Response: Requested changes made, item 7 was added. Pages 2 and 3 of red-line copy.

B-2a Traffic Information:

11) Exhibits B5, B6, and B7 are maps that illustrate various traffic patterns on-site. Exhibit B7 shows truck traffic patterns. HCC must verify that Exhibit B7 is correct for truck traffic.

HCC Response: Exhibits B5, B6, and B7 have been updated to reflect current site conditions.

12) Please include the type of vehicle expected to be accessing the property such as single axle trucks, tandem axle tank trailers, etc.

HCC Response: Section has been updated. Page 4 of red-line copy.

B-2b Seismic Considerations

13) HCC must make the following statement in Section B: "portions of the facility were treatment, storage, or disposal of hazardous waste will be conducted shall not be located within sixty-one meters (two hundred feet) of a fault which has had displacement in Holocene time." The statement can be added at item 13 on page 5.

HCC Response: Item was added as suggested. Page 6 of red-line copy.

B-4 Topographical Map

14) HCC shall provide an updated map that shows contours appropriate to the relief of the facility. Construction activities over the past 10 years may have changed the relief of the facility.

HCC Response: HCC is providing an updated topographical map to replace the current map.

15) HCC must submit an updated map which has contours sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit at the facility. Construction activities over the past 10 years may have changed the patterns of surface water flow.

HCC Response: The contours of the facility have not changed significantly, operational areas of the facility drain to the site storm water management system. Other areas of the facility drain away from the operational areas. See revised topographical map.

16) HCC should provide a map which shows the surface water bodies in the immediate area, if applicable.

HCC Response: Added USGS Map of the area with the facility identified and bodies of water are visible. Exhibit B-1

17) HCC refers to Plan Sheet 2. There is no Plan Sheet 2 nor is there a plan sheet that shows the location of all operational units. For example, the location of the "Process Tank Dike" (located in the LUWA room) is not shown on any of the site plans or maps. Please provide a map which shows the location of the treatment and storage operations.

HCC Response: Reference to Plan Sheet 2 are deleted and reference to the Site Map are replacing the reference. The Site Map is Exhibit B-2.

18) Page B6. HCC should add a description on how the rain retention basin (the "swimming pool") ties into the Rainwater Containment System.

HCC Response: Description has been updated to include the retention basin. Page 7 of red-line copy.

General Comments

19) Page B5, middle of the page there is a discussion on HCC's hazardous waste management facility. The description is outdated and should be revised.

HCC Response: The discussion has been updated. Page 6 of red-line copy.

20) Pages B7 and B8, HCC should update item (17), Location of Operation Units. The text on these pages is identical to the text on pages 2 and 3, therefore, the comment found in comment 10 apply to pages B7 and B8.

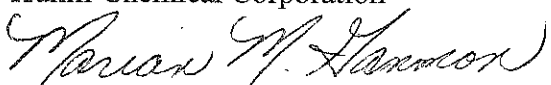
HCC Response: The section has been updated. Pages 8 and 9 of red-line copy.

Certification page is also included. Section J.

If you have any question or require additional information please feel free to call me at (440) 232-1924 extension 1230.

Sincerely,

Hukill Chemical Corporation



Marian M. Gammon
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Attachments

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November 5, 2004

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Columbus, Ohio 43216-1049

Re: NOD Response to Renewal Application
Hukill Chemical Corporation
U.S. EPA I.D. OHD001926740
Ohio EPA I.D. 02-18-0315

Dear Ms. Allen,

Hukill Chemical Corporation (HCC), is responding to Ohio EPA NOD sent March 1, 2004 and September 9, 2004 regarding Sections C, Waste Analysis Plan (WAP), from the site Hazardous Waste Permit Renewal Application.
The changes are administrative and informational changes to provide clarification for the sites current conditions.

A red-line copy and clean copy are provided for your review. Due to the number of changes and clarification a clean copy is provide with the current date to be used as the facility permit application.

Ohio EPA's comment is stated followed by HCC response along with the referenced page(s) with the appropriate changes.

Section C- Waste Analysis Plan

Parameters and Rationale
OAC 3745-54-13(B)(1)

1.) Page 8, PCB Analysis. HCC must develop of list of wastes which are considered suspect PCB containing waste streams and describe the protocol it will use for profiling and managing these waste streams. PCB analysis will be mandatory for wastes on the suspect PCB list.

HCC Response: Statement was added to discuss what waste are suspect and require additional sampling.

2.) HCC fails to account for potential changes in waste characteristics in all phases of

the treatment process. As an example, HCC should discuss the steps that will be taken if a waste stream (s) is being processed and it begins to polymerize, smoke, etc. This description is to address those situations that do not require implementation of the contingency plan.

HCC Response: Additional information was provided to discuss the steps that will be taken if a waste stream begins to polymerize, smoke, etc.

3.) HCC must describe the parameters and rationale for testing waste after treatment to make sure treatment was effective. (This topic is discussed on page 17 and should be moved to the Parameters and Rationale section of the WAP.)

HCC Response: A discussion was added to the Parameters and Rational section of the plan which discusses what analysis are conducted to ensure treatment was effective. (Page 8 of the red-line copy)

Test Methods:
OAC 3745-54-13(B)(2)

4) In Section C-2b of HCC's permit application, test methods for each parameter are listed. HCC needs to specify whether these tests will be performed in an on-site or an off-site laboratory.

HCC Response: A statement was added to the beginning of the section which states that tests will be conducted on-site unless otherwise note. It is noted next to the analysis. (Pages 7 and 11 of the red-line copy)

5) Page 7 of Section C-2 describes the organizational structure of the lab personnel. This description should also include who is responsible for quality assurance (QA) and how others report to him or her. This should include who is responsible for QA of off-site labs as well.

a) A description of the training required for those involved in QA/QC is not described here or in Section H of the application. Either include a description of the training in this section of the WAP, or refer to Section H and add the required description to Section H, Personnel Training. Same comment applies to training requirements for personnel collecting samples.

HCC Response: HCC laboratory personnel are responsible for implementing and verifying QA/QC requirements are met. Also section H of the Permit has been modified to include Laboratory Personnel more clearly. In the past they have received the same training as the Operators along with specific laboratory procedure training. (Pages 11 and 15 of the red-line copy)

6) In Exhibit C-5, Laboratory Quality Assurance/Quality Control Program, HCC describes Performance and Systems Audits for the Quality Assurance (QA) Program. HCC must define how often these audits will occur. Also, HCC must specify that the following will occur at a specified time frame:

a check for completeness of records;
evaluation of data with respect to detection and quantitation limits;
evaluation of data with respect to control limits;
review of holding time data; and
calibration of instruments.

HCC Response: This is specific to the analysis and is provided in the analytical procedures provided in Exhibit C-5.

7) In Exhibit C-5, Laboratory Quality Assurance/Quality Control Program, HCC does not provide adequate detail on quality control methods, including analysis of method blanks, matrix spikes, surrogate spikes, and duplicate samples which are used to measure laboratory precision and accuracy.

HCC Response: The analysis performed by HCC Laboratory is to verify that the material being received is with in the profile for the material. HCC does not recharacterize the material. Specific QA/QC requirements for each analysis are provided in Exhibit C-5. (Discussion also on Page 7 of red-line copy)

<u>Sampling Methods:</u>
OAC 3745-54-13(B)(3)

8) In Section C-2c - Sampling Methods, HCC has not provided adequate information to demonstrate compliance with the requirements of OAC

3745-54-13(B)(3). For example, types of information as detailed in Ohio EPA DHWM's Waste Analysis Plan Guidance (WAP Guidance) should be included, such as:

Appropriate maintenance and decontamination procedures must be specified for each piece of sampling equipment.
HCC must specify holding times for each sample.
HCC must describe a method for documenting and justifying deviations from the Waste Analysis Plan.
HCC must identify proper chain of custody procedures to be followed in the Waste Analysis Plan and shall include an example of the chain of custody form.
A clearly defined sampling approach that includes the objectives of sampling, types of samples needed, sampling frequency, collection techniques and handling techniques.

HCC Response: Sections discussing sapling equipment, hold times and a chain of custody form have been added. As discussed earlier HCC does not sample for characterization of the material. HCC analysis is to verify the material is with in the profile. (Pages 15 and 17 of red-line copy)

Frequency of Analysis:
OAC 3745-54-13(A)(3) & (B)(4)

9) On page 13, Section C-2b - Testing Methods, HCC states that products are analyzed by every customer on a regular basis. Table C-2 describes the sampling protocol for established as well as new customers. HCC must state that the wastes will be re-evaluated according to new customer sampling protocol when waste generating processes are changed for an established customer. Also, wastes should be re-evaluated according to new customer sampling protocol when wastes characterized by the TSDF do not match the pre-approved waste analysis or manifest submitted by the generator.

HCC Response: The above statement has been added to page 15 (of the red-line copy).

Additional Requirements for Wastes Generated Off-Site:
OAC 3745-54-13(B)(5) & (C)

10) Page 7 of Section C-2 describes the responsibilities of lab personnel with respect to acceptance and rejection of a load and determining manifest and Land Disposal Restriction (LDR) discrepancies. HCC fails to describe what happens to a load that is rejected or found to be discrepant. HCC must describe what is to be done with a rejected load. HCC must state that the facility will comply with OAC Rule 3745-54-72 for manifest

discrepancies.

HCC Response: A description of what happens to a material that is not within the profile and rejected loads. (Pages 7 and 8)

11) Sections C-2a and C-2b describe the parameters and testing methods for these parameters. Hukill fails to list the acceptance and rejection criteria for each parameter specified. This information must be included in the Waste Analysis Plan. Specifically, acceptance/rejection criteria was not listed for the Percent Chloride test, the Reactive Sulfide Determination, or the Hydrocyanic Acid test. HCC shall also provide rationale for acceptance/rejection criteria chosen.

HCC Response: Discussion of acceptance/rejection criteria was added. Material may be accepted even if the material does not meet the acceptance criteria. (Page 8 red-line copy)

Additional Requirements for Ignitable, Reactive or Incompatible Wastes:
OAC 3745-54-13(B)(6), 3745-54-17

12) HCC must define which waste streams are incompatible and how these waste streams will be managed in a safe manner.

HCC Response: Incompatible waste will not be stored next to each other. Discussed on Page 17 and 18.

Waste Specific Prohibitions: Toxicity characteristic metal wastes:
OAC 3745-270-34

13) HCC must state that D004 to D011 wastes, soil or debris identified as hazardous by TCLP, but not the extraction procedure, are prohibited from land disposal unless the wastes meet the applicable treatment standards of OAC 3745-270-40 to 49.

HCC Response: Statement has been added. (Page 18 of red-line copy)

Waste Specific Prohibitions: Wastes with ignitable and corrosive characteristics:
OAC 3745-270-37

14) Exhibit C-10 - Notification of Hazardous Waste Restricted From Land Disposal lists D001 waste in the high TOC ignitable liquids subcategory but does provide a line for D001 waste not in the high TOC ignitable liquids subcategory. HCC must state the D001 waste (that is not in the high TOC ignitable liquids subcategory) that are managed in systems other than those whose discharge is regulated under the clean water act (CWA), or that inject in Class I deep wells regulated under the safe drinking water

act, or that are zero dischargers that engage in CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal.

HCC Response: Exhibit C-10 has been revised and referenced on Page 22 of the red-line copy.

Waste Specific Prohibitions: Organic toxicity wastes, coke by-product wastes, and chlorotoluene production wastes:
OAC 3745-270-38

15) HCC must state that the following wastes are prohibited from land disposal unless the wastes meet the applicable treatment standards of OAC 3745-270-40 to 49:

1) K141 to K145 wastes;
2) Debris contaminated with F037, F038, K136, U328, U353, U359;
3) Soil and Debris contaminated with D012 to D043, K141 to K145; and
4) D012 to D043 wastes that are not radioactive, or are managed in systems whose discharges are not regulated by the CWA, or that are zero dischargers that do not engage in CWA-equivalent treatment (as defined in OAC Rule 3745-270-38(A)(3)) before land disposal.

HCC Response: The above requested items have been added. (Page 22 of the red-line copy)

Waste Specific Prohibitions: Reactive Wastes:
OAC 3745-270-39(B)

16) HCC must state the D003 waste (except unexploded ordnance and other explosive devices which have been the subject of an emergency response) that are managed in systems other than those whose discharge is regulated under the clean water act (CWA), or that inject in Class I deep wells regulated under the safe drinking water act, or that are zero dischargers that engage in CWA-equivalent treatment before ultimate land disposal, are prohibited from land disposal.

HCC Response: The statement has been added to page 22 of the red-line copy.

Additional Requirements Pertaining to Storage of Restricted Wastes:OAC 3745-270-50(A), (D) & (F)

17) HCC must demonstrate in the Waste Analysis Plan that storage of wastes that are restricted from land disposal is solely for the purpose of

accumulating sufficient quantities of waste to facilitate proper treatment, recovery, or disposal. HCC should also note that restricted wastes cannot be stored longer than one year unless the permittee demonstrates that additional storage time is necessary to facilitate proper recovery, treatment, or disposal. To demonstrate compliance with this requirement, HCC may provide a copy of the daily drum storage report log and explain how the report aids in ensuring that drums are not stored longer than one year.

HCC Response: HCC has addressed the comment by providing a description of the log and provided a copy as Exhibit C-17. (Page 24 red-line copy)

General Section Comments

18) Exhibits C-3 through C-7 and C-12 through C-15 are not clearly labeled or have been cut off at the bottom of the page. The attachments in Section C of the permit application must be clearly labeled and visible.

HCC Response: Exhibits have been revised with clear labeled attachments.

19) On page 18 of Section C, the references to OAC Chapter 3745-59 must be deleted and replaced with references to OAC Chapter 3745-270.

HCC Response: Correction has been made, on red-line copy it is now page 21.

20) On page 19 of Section C-3c(2), the exhibit number referenced at the end of the paragraph is missing. HCC must provide an appropriate exhibit number for this reference.

HCC Response: The appropriate exhibit number has been added, on red-line copy page 23.

21) Exhibits C-3 and C-4 provide examples of Sample analysis sheets. The revision number on these sheets is (rev 8/89). If the sample analysis sheets have been updated since the version in the application, please replace (rev 8/89) with the most recent version.

HCC Response: Exhibits C-3 and C-4 have been updated with 2004 analysis sheets.

22) Page 2, Overview-Solvent wastes. On this page, Hukill provides an overview of management of solvent waste streams. Please include the information that HCC is a treatment and storage facility as well as a

recycling and waste management facility.

HCC Response: Page 2 has been revised to include treatment and storage.

23) Table C-1 is inaccurate. HCC no longer receives corrosive wastes for hazardous waste management. HCC should remove the "Corrosives" tree from this table. In its place, HCC should include a logic flow for mandatory PCB testing on suspect PCB containing waste streams.

HCC Response: Table C-1 has been updated since HCC no longer receives corrosive waste for hazardous waste management.

24) Exhibits C-10 and C-11 are examples of a blank and a completed LDR form. These example LDR forms are from 1994. Please replace these exhibits with the LDR form in use.

HCC Response: Exhibits C-10 and C-11 have been revised and the current LDR forms in use are now Exhibits C-10 and C-11.

Additional Comments from September letter.

25) A correction to Table C-2 should be made. Table C-2 should read that for incoming containers, the sample frequency is per line item found on the hazardous waste manifests.

HCC Response: The table was revise to include the above statement.

26) Exhibit C-17, Drum Inventory Log, was referenced but not included in the draft.

HCC Response: The log is included in this submittal.

27) Exhibit C-5, Laboratory Quality Assurance/ Quality Control Program, was missing the protocols for the following test methods.

a) APV
b) Karl Fisher
c) Total Organic Carbon
d) No free liquids
e) PCB analysis
f) Reactive Sulfide Determination
g) Hydrocyanic Acid.

HCC Response: Exhibit C-5 now includes the above listed items.

28) In Section C-1, Chemical and Physical Analyses, HCC provides a brief overview of types of wastes handled at the facility. HCC failed to include the D003 waste stream in this overview and should describe what types of D003 wastes are handled at the facility.

HCC Response: D003 is now addressed in Section C-1 page 4 of the red-line copy.

29) HCC failed to include a discussion on the handling of containerized bulk waste streams that are acceptable by HCC for storage prior to shipment to another treatment/storage/disposal facility (TSDF) as HCC generated waste. HCC should provide an explanation on how HCC verifies that the material in the containers/tanker truck matches what is on the manifest before HCC transports the "HCC generator waste" to another TSDF.

HCC Response: A discussion regarding the above items was add to the overview page 2 red-line copy.

30) On page 6 of the Draft WAP, paragraph two reads: "Customers are advised on the Waste Data Sheets that unacceptable materials include organic cyanides, lachrymators, PCBs, inceditcides, pesticides, herbicides, or other severely toxic, poisonous, explosive, corrosive, reactive, or radioactive materials." The wording is not consistent with what is found on the Waste Data Sheet. The Waste Data Sheet states: "HCC does not accept waste containing PCB's >40ppm, Dioxin, Radioactive, or Biological Compounds." HCC should correct the text or the Waste Data Sheet.

HCC Response: HCC has revised the WAP to be consistent with the Waste Data Sheet. (Page 6 red-line copy)

Certification page is also included. Section J.

If you have any question or require additional information please feel free to call me at (440) 232-1924 extension 1230.

Sincerely,

Hukill Chemical Corporation

Marian M. Gammon

Marian M. Gammon
EH&S, Manager

Attachments

CC: Harriet Croke, Chief
Ohio Permitting Section (HRP-8J)
Waste Management Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

R. Hukill w/o att
V. Valentino w/o att

Marlene Kinney
Environmental Specialist
Ohio EPA, NEDO
2110 East Aurora Road
Twinsburg, Ohio 44087
(2 copies)

MAIL THE COMPLETED FORM TO: The Appropriate EPA Regional or State Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**	

1. Reason for Submittal (See instructions on page 25)

CHECK CORRECT BOX(ES)

Reason for Submittal:

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☐ To provide subsequent notification (to update site identification information).
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application.
- ☒ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #Part B Renewal
- ☐ As a component of the Hazardous Waste Report.

2. Site EPA ID Number (See instructions on page 26)

EPA ID Number: OHD 001 926 740

3. Site Name (See instructions on page 26)

Name: Hukill Chemical Corporation

4. Site Location Information (See instructions on page 26)

Street Address: 7013 Krick Road

City, Town, or Village: Bedford **State:** Ohio

County Name: Cuyahoga **Zip Code:** 44146

5. Site Land Type (See instructions on page 26)

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

6. North American Industry Classification System (NAICS) Code(s) for the Site (See instructions on page 26)

A.	B.
42269	325998
C.	D.

7. Site Mailing Address (See instructions on page 27)

Street or P. O. Box: Same as #4, above

City, Town, or Village:

State:

Country: **Zip Code:**

8. Site Contact Person (See instructions on pages 27)

First Name: Robert **MI:** L. **Last Name:** Hukill

Phone Number: 440-232-9400 **Phone Number Extension:** 1245

9. Legal Owner and Operator of the Site (See instructions on pages 27 and 28)

A. Name of Site's Legal Owner: Hukill Chemical Corporation **Date Became Owner (mm/dd/yyyy):** 07/14/1965

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Operator: N/A **Date Became Operator (mm/dd/yyyy):**

Operator Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID No. O H D 0 0 1 9 2 6 7 4 0

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 28 to 32)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose only one of the following three categories)

- [X] a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- [ ] d. United States Importer of Hazardous Waste
- [ ] e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

- [X] **2. Transporter of Hazardous Waste**
- [X] **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- [X] **4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- **5. Exempt Boiler and/or Industrial Furnace**
  - [ ] a. Small Quantity On-site Burner Exemption
  - [ ] b. Smelting, Melting, and Refining Furnace Exemption
- [ ] **6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	[ ]	[X]
b. Pesticides	[ ]	[ ]
c. Thermostats	[ ]	[ ]
d. Lamps	[X]	[X]
e. Other (specify) _____	[ ]	[ ]
f. Other (specify) _____	[ ]	[ ]
g. Other (specify) _____	[ ]	[ ]

- [ ] **2. Destination Facility for Universal Waste**
  Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities used oil is handled as haz waste at Hukill.

1. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- [X] a. Transporter (added to ChemFuel)
- [ ] b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] **3. Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 33)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

PLEASE SEE PAGES 5 OF 6 OF THE HAZARDOUS WASTE PERMIT INFORMATION FORM WHICH FOLLOWS.						

EPA ID No. OHD001926740

11. **Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

PLEASE SEE	PAGES 5 OF 6	OF THE HAZARDOUS	WASTE PERMIT	INFORMATION	FORM WHICH	FOLLOWS.

12. Comments (See instructions on page 33)

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. **(See instructions on page 33)**

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
Robert L Hukill	Robert L. Hukill, President	6/17/04

OMB #: 2050-0034 Expires 10/31/02

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: Robert	MI: L.	Last Name: Hukill
	Phone Number: 440-232-9400		Phone Number Extension: 1245
2. Facility Permit Contact Mailing Address (See instructions on page 35)	Street or P.O. Box: 7013 Krick Road		
	City, Town, or Village: Bedford		
	State: Ohio		
	Country: USA		Zip Code: 44146
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: Same		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	Phone Number
4. Operator Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: Same		
	City, Town, or Village:		
	State:		
	Country:	Zip Code:	Phone Number
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 1968		

6. Other Environmental Permits (See instructions on page 36)

A. Permit Type (Enter code)	B. Permit Number	C. Description
E	1 3 1 8 0 3 0 1 7 2	General Facility ID for Air Permits (over 100)
E	2 9 1 1 3 6 0 S 1 U R 3	Sewer Discharge Permit (for stormwater

7. Nature of Business (Provide a brief description; see instructions on page 37)

Hukill is a distributor of industrial acids, alkalies and solvents. Also a RCRA facility actively engaged in recycling waste solvent streams back to industry as distilled solvents and and supplemental fuel for cement kilns. Hukill also consolidates high BTU bulk and contaminated waste into a "HW Fuels Blend" used by incinerators as supplemental fuel. "Fuels Blending" is a RCRA permitted process.

8. Process Codes and Design Capacities (See instructions on page 37)

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.*

B. PROCESS DESIGN CAPACITY- *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*

2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units for each corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Hour; Liters Per Hour; or Million Btu Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
	Halogen Acid Furnaces	
	Other Industrial Furnaces	
T92	Listed In 40 CFR §260.10	
T93		
T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	Miscellaneous (Subpart X)	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Million Btu Per Hour	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu Per Hour	I

8. Process Codes and Design Capacities (*Continued*) EPA ID# OHD001926740

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	55,000.00	U	002	
	2	S	0	2	185,000.00	U	019	
	3	T	0	1	Auger Tank (750) 27,500	U	001	
	4	T	0	1	Hochmeyer Tank (1000) 63,000	U	001	
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (*See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes*)

Line Number (Enter #s in sequence with Item 8)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	D. Description of Process
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

10. Description of Hazardous Wastes (See instructions on page 37) EPA ID# OHD001926740

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item 10.D(1).*
3. *Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

Hukill updated its Part A App., 2002 and revised several waste code sheets. Retyping those pages took a lot of time. Rather than retype on the new form, they are attached as modified earlier to avoid duplication of effort.

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	D031	450	T	S01 S02 T01	
2	D032	450	T	S01 S02 T01	
3	D033	450	T	S01 S02 T01	
4	D034	450	T	S01 S02 T01	
5	D035	450	T	S01 S02 T01	
6	D036	450	T	S01 S02 T01	
7	D037	450	T	S01 S02 T01	
8	D038	450	T	S01 S02 T01	
9	D039	450	T	S01 S02 T01	
10	D040	450	T	S01 S02 T01	
11	D041	450	T	S01 S02 T01	
12	D042	450	T	S01 S02 T01	
13	D043	450	T	S01 S02 T01	
14	F001	100,000	T	S01 S02 T01	
15	F005 and D001 thru D043				Included with above.
16	F002	100,000	T	S01 S02 T01	
17	F003 thru F005 and D001 thru D043				Included with above.
18	F004	100,000	T	S01 S02 T01	
19	F002, F004, F005 and D001 thru D043				Included with above.
20	F003	100,000	T	S01 S02 T01	
21	F002, F003, F005 and D001 thru D043				Included with above.
22	F005	100,000	T	S01 S02 T01	
23	F006	6,000	T	S01 S02 T01	
24	F004 and D001 thru D043				Included with above.
25	D043 included with the following waste codes to end.				
26	F019	3,000	T	S01 S02 T01	
27	F024	3,000	T	S01 S02 T01	
28	F025	3,000	T	S01 S02 T01	
29	F037	6,000	T	S01 S02 T01	
30	F038	6,000	T	S01 S02 T01	
31	F039	6,000	T	S01 S02 T01	
32	K090	3,000	T	S01 S02 T01	
33	K010	3,000	T	S01 S02 S01	

10. Description of Hazardous Wastes (*Continued; use additional sheets as necessary*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	100,000	T	S01 S02 T01	
2	F001 thru F005 and D002 thru D043			T01	Included with above.
3	D002	85,700	T	S01 S02 T01	
4	F001 thru F005 D001 and D004 thru D043			T01	Included with above.
5	D003	450	T	S01 S02 T01	
6	F001 thru F005 and D004 thru D043				Included with above.
7	D004	450	T	S01 S02 T01	
8	D005	450	T	S01 S02 T01	
9	D006	450	T	S01 S02 T01	
10	D007	450	T	S01 S02 T01	
11	D008	450	T	S01 S02 T01	
12	D009	450	T	S01 S02 T01	
13	D010	450	T	S01 S02 T01	
14	D011	450	T	S01 S02 T01	
15	D012	450	T	S01 S02 T01	
16	D013	450	T	S01 S02 T01	
17	D014	450	T	S01 S02 T01	
18	D015	450	T	S01 S02 T01	
19	D016	450	T	S01 S02 T01	
20	D017	450	T	S01 S02 T01	
21	D018	450	T	S01 S02 T01	
22	D019	450	T	S01 S02 T01	
23	D020	450	T	S01 S02 T01	
24	D021	450	T	S01 S02 T01	
25	D022	450	T	S01 S02 T01	
26	D023	450	T	S01 S02	
27	D024	450	T	S01 S02	
28	D025	450	T	S01 S02 T01	
29	D026	450	T	S01 S02 T01	
30	D027	450	T	S01 S02 T01	
31	D028	450	T	S01 S02 T01	
32	D029	450	T	S01 S02 T01	
33	D030	450	T	S01 S02 T01	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	K014	3,000	T	S01 S02 T01	
2	K015	3,000	T	S01 S02 T01	
3	K016	3,000	T	S01 S02 T01	
4	K017	3,000	T	S01 S02 T01	
5	K018	3,000	T	S01 S02 T01	
6	K019	3,000	T	S01 S02 T01	
7	K020	3,000	T	S01 S02 T01	
8	K021	3,000	T	S01 S02 T01	
9	K022	3,000	T	S01 S02 T01	
10	K023	3,000	T	S01 S02 T01	
11	K024	3,000	T	S01 S02 T01	
12	K025	3,000	T	S01 S02 T01	
13	K026	3,000	T	S01 S02 T01	
14	K028	3,000	T	S01 S02 T01	
15	K029	3,000	T	S01 S02 T01	
16	K030	3,000	T	S01 S02 T01	
17	K048	6,000	T	S01 S02 T01	
18	K049	6,000	T	S01 S02 T01	
19	K050	3,000	T	S01 S02 T01	
20	K051	3,000	T	S01 S02 T01	
21	K052	3,000	T	S01 S02 T01	
22	K060	3,000	T	S01 S02 T01	
23	K061	3,000	T	S01 S02 T01	
24	K062	3,000	T	S01 N/A	
25	K083	3,000	T	S01 S02 T01	
26	K085	3,000	T	S01 S02 T01	
27	K086	900	T	S01 S02 T01	
28	K087	10,000	T	S01 S02 T01	
29	K093	3,000	T	S01 S02 T01	
30	K094	3,000	T	S01 S02 T01	
31	K095	3,000	T	S01 S02 T01	
32	K096	3,000	T	S01 S02 T01	
33	K103	3,000	T	S01 S02 T01	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	K104	3,000	T	S01 S02 T01	
2	K105	3,000	T	S01 S02 T01	
3	K136	3,000	T	S01 S02 T01	
4	K141	10,000	T	S01 S02 T01	
5	K142	10,000	T	S01 S02 T01	
6	U002	2,400	T	S01 S02 T01	
7	U004	450	T	S01 S02 T01	
8	U007	450	T	S01 S02 T01	
9	U008	450	T	S01 S02 T01	
10	U017	450	T	S01 S02 T01	
11	U019	450	T	S01 S02 T01	
12	U021	450	T	S01 S02 T01	
13	U023	450	T	S01 S02 T01	
14	U024	450	T	S01 S02 T01	
15	U025	450	T	S01 S02 T01	
16	U027	450	T	S01 S02 T01	
17	U028	450	T	S01 S02 T01	
18	U029	450	T	S01 S02 T01	
19	U031	450	T	S01 S02 T01	
20	U032	450	T	S01 S02 T01	
21	U037	450	T	S01 S02 T01	
22	U039	450	T	S01 S02 T01	
23	U043	450	T	S01 S02 T01	
24	U044	450	T	S01 S02 T01	
25	U045	450	T	S01 S02 T01	
26	U047	450	T	S01 S02 T01	
27	U048	450	T	S01 S02 T01	
28	U049	450	T	S01 S02 T01	
29	U051	450	T	S01 S02 T01	
30	U052	450	T	S01 S02 T01	
31	U055	450	T	S01 S02 T01	
32	U056	450	T	S01 S02 T01	
33	U057	450	T	S01 S02 T01	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	U066	450	T	S01 S02 T01	
2	U067	450	T	S01 S02 T01	
3	U068	450	T	S01 S02 T01	
4	U069	450	T	S01 S02 T01	
5	U070	450	T	S01 S02 T01	
6	U071	450	T	S01 S02 T01	
7	U072	450	T	S01 S02 T01	
8	U075	450	T	S01 S02 T01	
9	U076	450	T	S01 S02 T01	
10	U077	450	T	S01 S02 T01	
11	U079	450	T	S01 S02 T01	
12	U080	450	T	S01 S02 T01	
13	U081	450	T	S01 S02 T01	
14	U082	450	T	S01 S02 T01	
15	U083	450	T	S01 S02 T01	
16	U088	450	T	S01 S02 T01	
17	U089	450	T	S01 S02 T01	
18	U092	450	T	S01 S02 T01	
19	U101	450	T	S01 S02 T01	
20	U102	450	T	S01 S02 T01	
21	U107	450	T	S01 S02 T01	
22	U112	450	T	S01 S02 T01	
23	U113	450	T	S01 S02 T01	
24	U117	450	T	S01 S02 T01	
25	U118	450	T	S01 S02 T01	
26	U121	450	T	S01 S02 T01	
27	U122	450	T	S01 S02 T01	
28	U123	450	T	S01 S02 T01	
29	U124	450	T	S01 S02 T01	
30	U126	450	T	S01 S02 T01	
31	U127	450	T	S01 S02 T01	
32	U128	450	T	S01 S02 T01	
33	U134	450	T	S01 S02 T01	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	U144	450	T	S01 S02 T01	
2	U145	450	T	S01 S02 T01	
3	U146	450	T	S01 S02 T01	
4	U147	450	T	S01 S02 T01	
5	U153	450	T	S01 S02 T01	
6	U154	450	T	S01 S02 T01	
7	U159	450	T	S01 S02 T01	
8	U161	450	T	S01 S02 T01	
9	U162	450	T	S01 S02 T01	
10	U165	450	T	S01 S02 T01	
11	U166	450	T	S01 S02 T01	
12	U167	450	T	S01 S02 T01	
13	U168	450	T	S01 S02 T01	
14	U169	450	T	S01 S02 T01	
15	U171	450	T	S01 S02 T01	
16	U182	450	T	S01 S02 T01	
17	U183	450	T	S01 S02 T01	
18	U184	450	T	S01 S02 T01	
19	U188	450	T	S01 S02 T01	
20	U190	450	T	S01 S02 T01	
21	U191	450	T	S01 S02 T01	
22	U196	450	T	S01 S02 T01	
23	U201	450	T	S01 S02 T01	
24	U207	450	T	S01 S02 T01	
25	U209	450	T	S01 S02 T01	
26	U210	450	T	S01 S02 T01	
27	U211	450	T	S01 S02 T01	
28	U213	450	T	S01 S02 T01	
29	U220	450	T	S01 S02 T01	
30	U223	450	T	S01 S02 T01	
31	U225	450	T	S01 S02 T01	
32	U226	450	T	S01 S02 T01	
33	U227	450	T	S01 S02 T01	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	U227	450	T	S01 S02 T01	
2	U228	450	T	S01 S02 T01	
3	U235	450	T	S01 S02 T01	
4	U238	450	T	S01 S02 T01	
5	U239	450	T	S01 S02 T01	
6	U328	450	T	S01 S02 T01	
7	U353	450	T	S01 S02 T01	Corrected from U323 on 4/14/94
8	U359	450	T	S01 S02 T01	

11. Map (See instructions on page 38) See Section B of this application.

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 39) Attached

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 39) Attached

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 39)

- See Section B of Part B for description and location of maps.
- See Section D of this Part B for process descriptions.
- See Plan Sheets 2 & 2A in Plan Sheet book of Part B for facility drawings.
- See Plan 2B for previous location of H.W. storage tanks.

Latitude 41 22 22
Longitude 081 31 45

SIGNATURE: Robert L Hukill DATE: 6/17/04
Robert L. Hukill, President

PART B

SECTION B

FACILITY DESCRIPTION

This section provides a general description of the hazardous waste management facility as required by OAC 3745-50-44. This section is intended to acquaint the permit application reviewer/permit writer with an overview of the facility. More complete details can be found in other parts of this permit application.

B-1 General Description

Hukill Chemical Corporation is a hazardous waste treatment and storage facility, located in a southeastern suburb of Cleveland, Ohio. The street address is:

Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

The mailing address is the same as the street address. The USGS map provided as Exhibit B-1 shows the general area including bodies of water, Rail road lines, road ways and other buildings in the area. This facility is primarily a chemical distribution center and solvent recovery facility. The solvent recovery facility accepts dirty industrial solvents from several different industries including automotive, polymer and chemical processing. Hukill uses two thin film evaporators (Luwas) and a fractionating distillation tower to reclaim solvent for return to the customer or sale to other customers.

A general facility drawing is provided as Exhibit B-2 which shows the locations of the items discussed below.The existing hazardous waste units requiring a permit are as follows: *Note that all existing diked storage tanks are constructed of carbon steel or stainless steel.*

1. The East Pad 7-tank dike contains seven 14,000 gallon vertical storage tanks for spent solvent and off-specification organic chemical wastes. This dike is located east of and adjacent to the processed solvents storage tank dike.

2. The Feed/Bottoms storage tank dike contains two 6,000 gallon, cone bottom, distillation feed tanks and one 16,000 gallon, cone bottom, distillation bottoms storage tank. The materials stored in these tanks are also organic chemical hazardous wastes.

3. The East Warehouse is used to store containerized spent solvent and organic chemical hazardous wastes in drums and portable tanks. The total facility permitted capacity for storage of containerized hazardous wastes is currently 55,000 gallons, equivalent to 1,000 fifty-five gallon drums.

4. The No-Free-Liquids outside storage area is east of the East Warehouse on the East Pad Containment Area. This area is used for storing

drums or portable containers of organic chemical hazardous wastes which have no free liquids. This area is rarely used but may be necessary for efficient management of containerized hazardous wastes.

5. The Hazardous waste Fuels Dike (F-1) is located on the east side of the East Warehouse. Three tanks T-14, T-15, and T-16 are also located in a concrete dike area.

6. The Drum Processing Hockmeyer and Auger treatment systems. These processes are used to remove liquid or semi-solid hazardous waste material from drums and blend the material into a HW Fuels Blend. More description about Drum Processing can be found in Section D – Process Description.

7. Process/feed tanks 8-3-F, 9-3-F, 10-3-F and 11-3-F are 2,900 gallon agitated, feed tanks. They are located in the processing building. They are located within a spill containment dike which is 412.5 cubic feet (3,086 gallons). More description about these tanks can be found in Section – D and Exhibit D-7.

Although the majority of materials recycled by Hukill fall into the category of hazardous wastes, Hukill Chemical Corporation does accept some wastes listed in OAC 3745-51-20 to -24 (Part 261) of the characteristic hazardous waste regulations.

The contact and responsible party for the hazardous waste management activities at Hukill Chemical Corporation is Robert L. Hukill, President. Telephone number: (440) 232-9400.

B-2 Traffic Information

(1) Traffic Patterns on Site: Traffic into the plant would enter through three gates. The eastern gate is almost exclusively used for East Pad loading or unloading of tanker trucks. The central gate is used for box trailer loading unloading of drums or other containers and tanker truck loading or unloading at Dock #10 which is used for reclaim loads. The western gate is used for deliveries to the Acid/Caustic department which is presently an unpermitted area of the facility.

Traffic to or from the travels on Krick Road to Northfield Road, South to Alexander Road, East to freeway marginal roads, and South to I-271. From this point, it is easy to go anywhere north or south and to connecting points east and west.

The types of vehicles used on site are tractor-trailers, double axle, single axle, trucks, cars and other similar vehicles.

(2) Estimated Volume: Volume of truck traffic varies considerably depending upon weather or customer disposal needs. In a typical day, Hukill will see 3 to 6 trucks accessing the east gate, 10-15 trucks accessing the central gate and 3 to 6 trucks accessing the western gate. Smaller deliveries such as pickup truck, Federal Express-type and smaller delivery tuck loads also occur throughout a typical day. These trucks almost always use the central gate.

(3) Traffic Control: The facility is surrounded by a six-foot high fence with three levels of barbed wire. Gates are closed at all times . Signs are posted throughout the facility directing all visitors to sign in and out at the main lobby.

(4) Access Road Surfacing: The central dock area for trailer access is concrete-paved as is the East Pad and adjacent nonhazardous drum storage area (in front of the Tank 13-16 dike). All other parking and drives are limestone gravel.

(5) Access Load-Bearing Capacity: To date, all Hukill access roads have demonstrated integrity to all facility traffic loads. We feel this demonstration information is adequate to satisfy the load bearing capacity information. Exhibit B-15 is the structural engineer's sketch for the concrete pad design installed in the East Pad Area from 1988 to the present.

The construction of Krick Road meets the American Association of State Highway and Transportation Officials' (AASHTO) Specification HS-20, Designed for Heavy Truck Traffic.

(6) Traffic Control & Signals: Traffic control patterns within the property and plant are shown on: Exhibits B-5 through B-7.

- Vehicular Traffic.....Exhibit B-5
- Truck Traffic.....Exhibit B-7
- Forklift Traffic.....Exhibit B-6

Vehicular traffic, employee and visitor vehicles, are restricted to the parking areas as shown. There are an estimated 30 to 40 of these vehicles on site during the day and only 5 to 10 during the off shifts. Contractors working on the facility are advised of the regulations and where they are permitted to park.

Forklift traffic is 5 to 10 fork trucks on-site with some of those recharging or in maintenance use.

Signals are not necessary since Hukill is a smaller facility and traffic congestion is not an issue.

B-3 - Floodplain Information Plan Sheet 4 shows the location of the 100 year flood plain. None of the Hukill facility is located within this flood plain area.

B-3a – Flood Proofing and Flood Protection Measures N/A

B-3b – Flood Plan/Waiver for Land Storage and Disposal Facilities N/A

B-3c – Plan For Future Waste Compliance This does not apply to Hukill Chemical which is not located in a flood plain. Because this is an existing rather than a new facility, the seismic standard does not apply. In addition, this facility is not located in an active fault zone.

B-4 – Certain Waste Placement Prohibitions Hukill is not located above or adjacent to any salt dome formation, salt bed formation, underground mine or cave. This does not apply.

B-5 – Topographic Map

Items (1) –(13): Plan Sheet 1 is an area topographical map showing a distance of 1,000 feet around the facility at a scale of 1 inch equals 200 feet. Site Map Exhibit B-2 is a facility map showing the facility boundaries, buildings, waste storage areas, and other details. Plan Sheet 3 is a topographic map showing 5-ft. contour intervals of elevation. This map shows the flow of surface waters. The scale of the maps is 1 inch equals 30 feet. This was discussed with the Region V Headquarters Chicago EPA and they indicated this was considered acceptable.
Surface water bodies shown on USGS map Exhibit B-1.
Plan Sheet 1A contains the required wind rose for this area and a north arrow. The planned facility information does not apply to this permit as the construction is no longer proposed.

Plan Sheet 3 shows the facility contour map and surface water flow.

Plan Sheet 5, found in the Appendix to Section B, shows surrounding land use areas for a distance of 1,000 feet around the facility.

The locations of the storm and sanitary sewers are shown on Plan Sheet 1A. HCC does not use any process sewers in its recycling processes.

The hazardous waste management facility consists of two container storage areas. The inside container storage area is for containers with free liquids. The outside storage area is for containers without free liquids. The facility also consists of three diked hazardous waste solvent tank storage areas. One with seven 14,000 gallon storage tank. One has a 16,000 gallon bottoms storage tank and two 6,000 gallon feed storage tanks. A fourth dike, F-1, contains three permitted tanks which were previously considered 90-day generator tanks.

These three tanks T-15, T-14 and T-16 are 10,000, 9,500 and 6,000 gallon tanks. The Process/feed tank dike containing tanks 8-3-F, 9-3-F, 10-3-F and 11-3-F (2,900 gallon agitated, feed tanks) is located in the processing building. The spill containment dike which is 412.5 cubic feet (3,086 gallons) meets the containment requirements. More description about these tanks and containment systems can be found in Section – D.

(13) Injection and Withdrawal Wells: The site has no injection or withdrawal wells. Monitoring wells are shown on Plan Sheet 5A and Exhibit B-2. These wells have been approved by OEPA for the ongoing Post-closure groundwater monitoring. No other wells are located on site or off-site within 1000 feet of the facility.
Based on the review of a available information portions of the facility where treatment, storage, or disposal of hazardous waste will be conducted are not believed to be located within sixty-one meters (two hundred feet) of a fault which has been displaced in Halocene time.

(14) Buildings, Treatment, Storage or Disposal Operations: Site Map, Exhibit B-2 shows the building and structures on the property as well the hazardous waste storage areas.

Items (15-16): Recreation areas are not applicable to this industrial park setting.

Plan Sheet 3 indicates surface drainage for the Hukill Chemical facility. The site is basically very flat and level until the east and north boundary lines. At the north point the property follows a steep grade into a ravine where a to Tinkers Creek is located. All the property north of the driveway (where equipment is stored) flows at a 1% grade for storm water control only.

On the eastern edge of the property, with exception of the drum storage pad and the truck pad which is curbed and drains into catch basins, the balance of the property is undeveloped.

A review of the parking lots from west to east indicates that the storm water run-off from the parking lot and front yard on the west drive flows into the middle drive and Rainwater Containment System. Run-off from the ramped shipping dock flows into an interceptor type catch basin which has the capability of holding three drums of liquid prior to discharging them to the Rainwater Containment System. This is a preventive measure in that if a fork lift damages a drum, the material is not lost and the bulk of the material can be recovered before it reaches the containment system.

The parking lot surface water near the east driveway enters the Rainwater Containment System at manhole 601. The entire remainder of the eastern driveway is controlled in that the truck unloading area, drum pad, and containment basin all drain into the Rainwater/Spill Containment Tank which has the capability of holding a 15,000 gallon spill. The area to the rear of the facility between the drive is also controlled with surface catch basins going into an interceptor behind the shipping dock which can hold a three drum spill without permitting it to enter the containment system. This is also an interceptor type design.

The only other surface water is that rainwater which enters through the roof drains which goes directly to the Rainwater Containment System. Thus, the Rainwater Containment System is a no-drain, no-flow stormwater system. The stormwater collected within the dike area of the tank farm is pumped into a storage tank, sampled, analyzed and logged by the chemist for his approval. The chemist will then determine whether the water can be processed on site or must go to an approved TSDF or to the treatment system and then the Sanitary Sewer.

The run-off control systems are described above and shown on the Plan Sheet 1A. The containment system for run-off diverts run-off from the outdoor operating areas of the facility to the 15,000 gallon containment tank. This tank is equipped with two 300 gallons per minute pumps which send the run-off to one of four 25,000 gallon storage tanks or a 100,000 gallon above ground containment "pool". The water in these tanks is sampled and tested for contaminants as each tank is filled and isolated.

The existing facility buildings, flammable drum storage area and canopy area are equipped with either a wet or dry fire sprinkler system. The water for this system is supplied by a 250,000 gallon fire water tank located on the east side of the facility. This tank is kept full and supplied by the city water system. This is an automatic system and is monitored by an outside monitoring service.

Details of the facility fire protection are provided in Section G, "Contingency Plan", of this application.

Additional fire protection is provided by the city fire department which is familiar with our facility and with whom we review our facility fire emergency needs on at least an annual basis.

(17) Location of Operational Units: The existing hazardous waste units requiring a permit are as follows: *Note that all existing diked storage tanks are constructed of carbon steel or stainless steel.*

1. The East Pad 7-tank dike contains seven 14,000 gallon vertical storage tanks for spent solvent and off-specification organic chemical wastes. This dike is located east of and adjacent to the processed solvents storage tank dike.

2. The Feed/Bottoms storage tank dike contains two 6,000 gallon, cone bottom, distillation feed tanks and one 16,000 gallon, cone bottom, distillation bottoms storage tank. The materials stored in these tanks are also organic chemical hazardous wastes.

3. The East Warehouse is used to store containerized spent solvent and organic chemical hazardous wastes in drums and portable tanks. The total facility permitted capacity for storage of containerized hazardous wastes is currently 55,000 gallons, equivalent to 1,000 fifty-five gallon drums.

4. The No-Free-Liquids outside storage area is east of the East Warehouse on the East Pad Containment Area. This area is used for storing drums or portable containers of organic chemical hazardous wastes which have no free liquids. This area is rarely used but may be necessary for efficient management of containerized hazardous wastes.

5. The Hazardous waste Fuels Dike (F-1) is located on the east side of the East Warehouse. The Ohio EPA is revising its policy on hazardous waste fuels blending tanks to consider them permitted tanks. Two of HCC's 90-day generator tanks in this dike sometimes receive off-site hazardous waste and will now be considered permitted tanks. These are two agitated cone bottom tanks, T-15 and T-14, with capacities of 9,500 and 10,000 gallons.

6. The Drum Processing Hockmeyer and Auger treatment systems. These processes are used to remove liquid or semi-solid hazardous waste material from drums and blend the material into a HW Fuels Blend. More description about Drum Processing can be found in Section D – Process Description.

7. Process/feed tanks 8-3-F, 9-3-F, 10-3-F and 11-3-F are 2,900 gallon agitated, feed tanks. They are located in the processing building. They are located within a spill containment dike which is 412.5 cubic feet (3,086 gallons). More description about these tanks can be found in Section – D and Exhibit D-7.

TerraServer Image Courtesy of the USGS

Send To Printer Back To TerraServer Change to 8.5x11 Print Size Show Grid Lines Change to Portrait

USGS 2 km NE of Northfield, Ohio, United States 01 Jul 1996

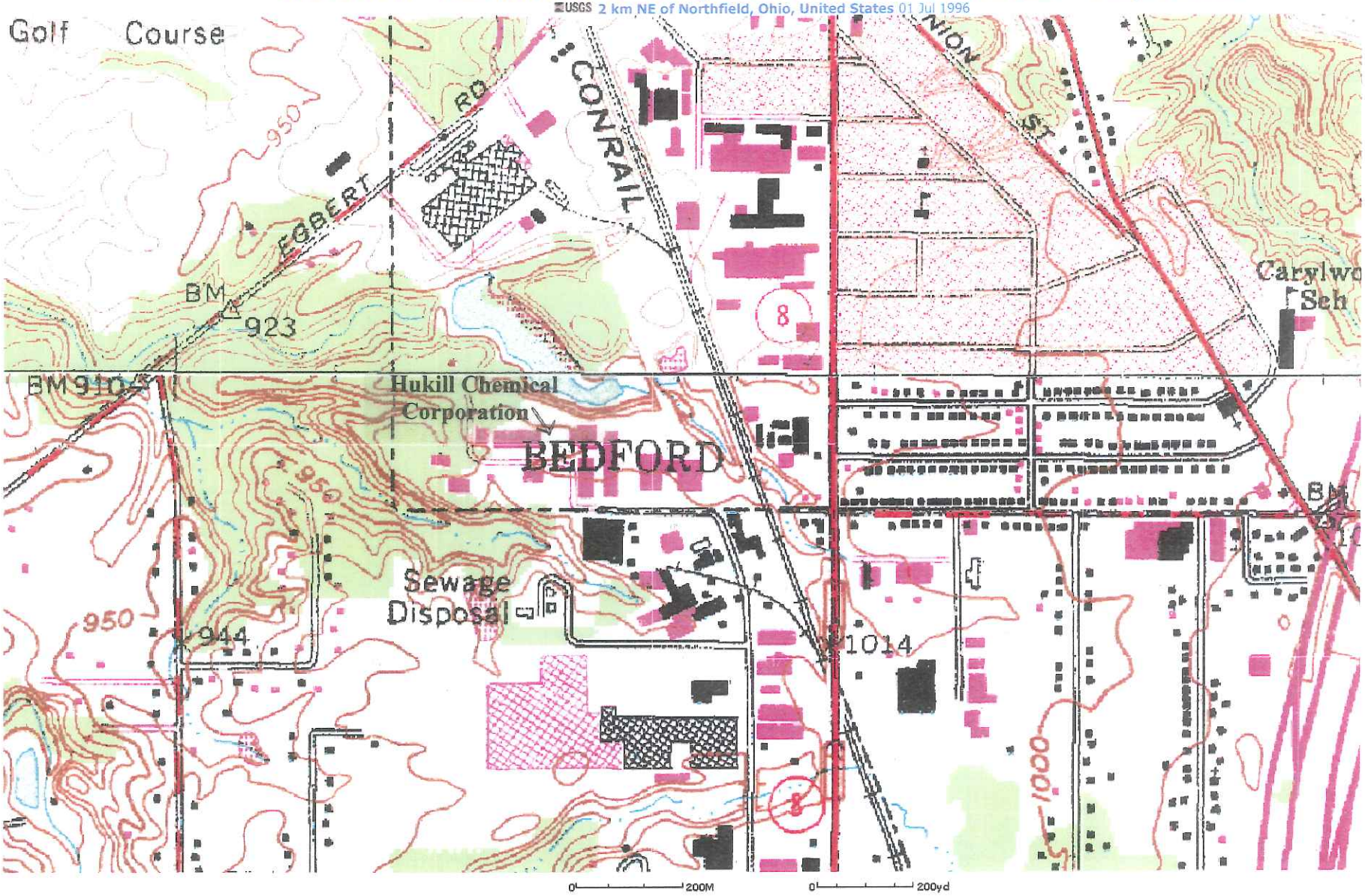
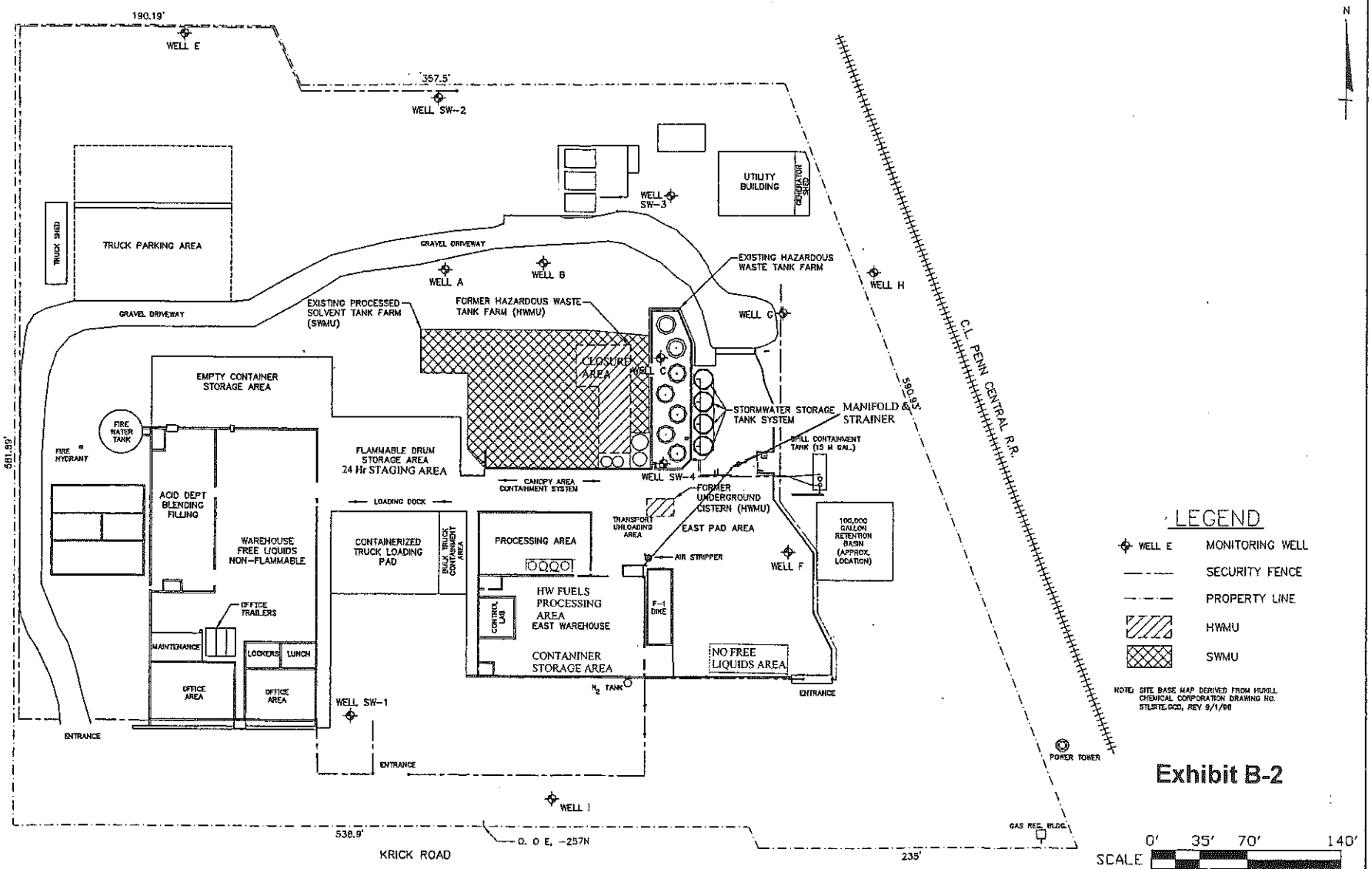


Image courtesy of the U.S. Geological Survey

Exhibit B-1



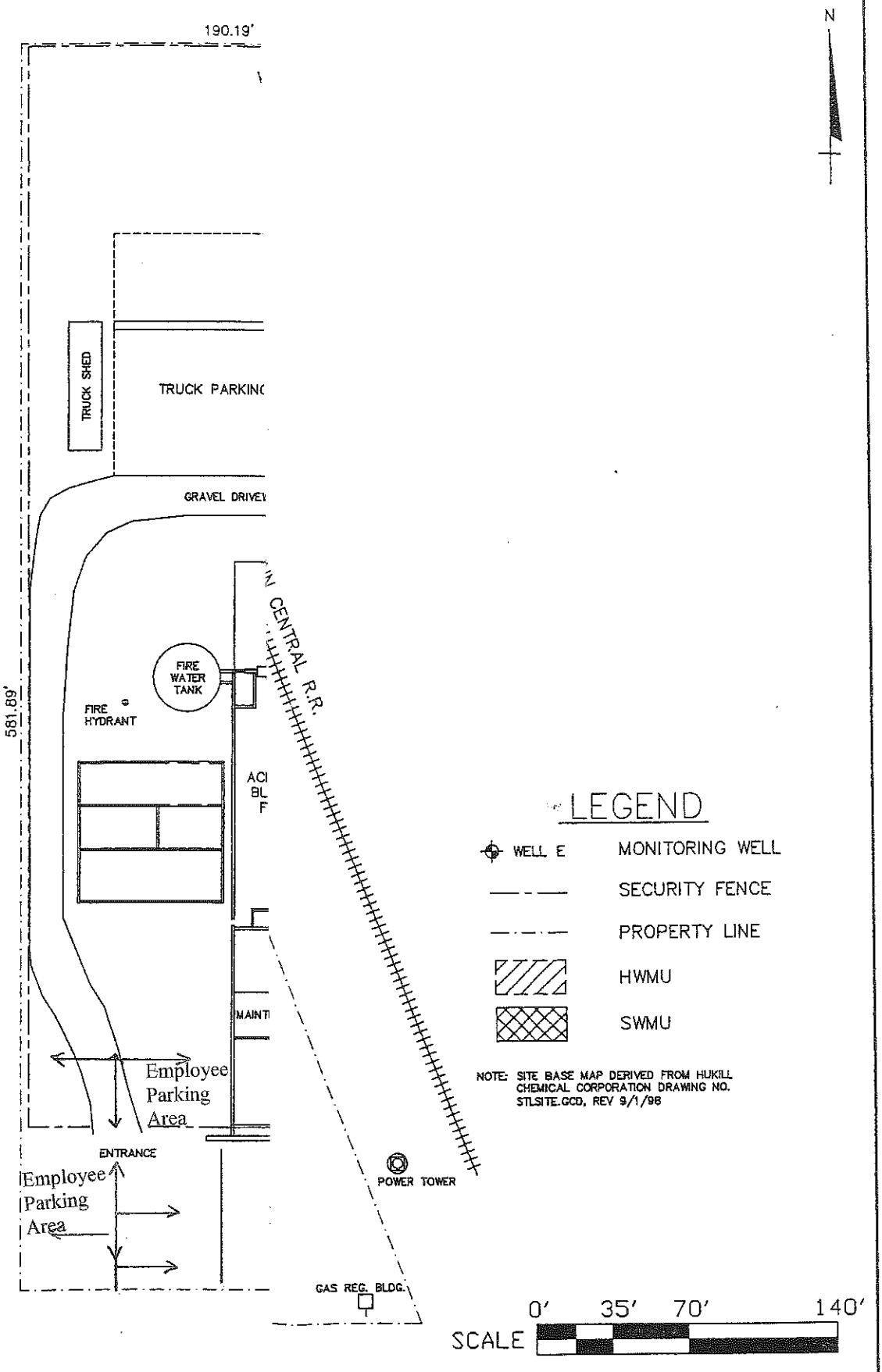
SITE MAP

HUKILL CHEMICAL CORPORATION
BEDFORD, OHIO

MAY 2004

33621.06

3521X019.DWG



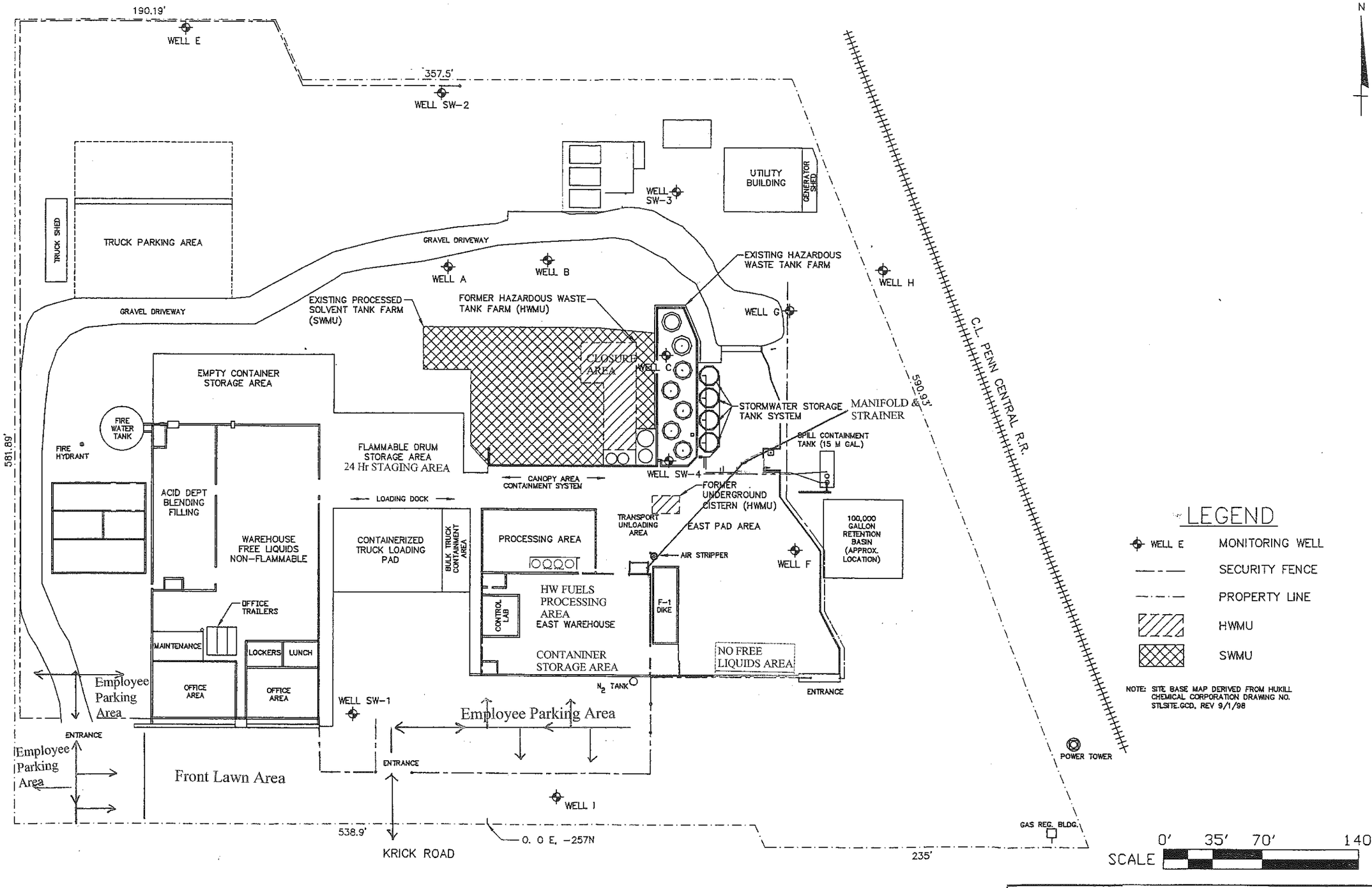
SITE MAP

HUKILL CHEMICAL CORPORATION
BEDFORD, OHIO

MAY 2004

33621.06

3621X019.DWG



Vehicle Traffic Pattern
Exhibit B-5

SITE MAP

HUKILL CHEMICAL CORPORATION
BEDFORD, OHIO

MAY 2004

33621.06

3621X019.DWG